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14 *Collectively Attorneys for Wildfire Claimants*
15 *With Approximately 18,000 Timely-Filed Notice of Claims*

16 **UNITED STATES BANKRUPTCY COURT**
17 **NORTHERN DISTRICT OF CALIFORNIA**
18 **SAN FRANCISCO DIVISION**

19 **In re:**

Bankruptcy Case
No. 19-30088 (DM)

20 **PG&E CORPORATION**

Chapter 11
(Lead Case; Jointly Administered)

21 **and**

22 **PACIFIC GAS & ELECTRIC COMPANY,**
23 **Debtors.**

RESPONSE TO JOINDERS
(Doc. Nos. 6656, 6659 & 6667)

- 24 ☐ Affects PG&E Corporation
25 ☐ Affects Pacific Gas and Electric Company
26 ☒ Affects both Debtors
27 *All papers shall be filed in the Lead Case,
28 No. 19-30088 (DM)

Date: April 7, 2020
Time: 10:00 a.m. (Pacific Time)
Place: (Telephonic Appearances Only)
Courtroom 17
450 Golden Gate Avenue,
16th Floor,
San Francisco, California
Re: Docket Nos. 6636, 6637, 6644

1 The undersigned, referred to herein merely as the WATTS GUERRA GROUP,
2 collectively represent the largest number of clients in this case--more than 18,000 people who
3 timely filed notices of claims.
4

5 It is each individual attorney's duty to provide information to his or her clients, and the
6 WATTS GUERRA GROUP has, and is doing so, pervasively via live and telephonic town
7 halls, update letters and systematic email updates as well. As was observed by the filing of the
8 SINGLETON LAW FIRM, which represents the second largest group of claimants at over
9 7,000 clients, it is not the right of only six attorneys representing only six fire victims with
10 impaired claims to choose the content of such disclosures for others. The concern raised is the
11 Motion before the Court may be construed as one side seeking to put its thumbs on the voting
12 scales by virtue of their titular title "TCC," and to thereby create media stories by ostensibly
13 speaking for others already represented who did not choose these six TCC lawyers as their
14 counsel. The WATTS GUERRA GROUP respects and appreciates the diligence of TCC
15 members and their attorneys, but now is the time for individual fire victims to vote on their own
16 after having been provided with the court-ordered Disclosure Statement already approved by
17 this honorable Bankruptcy Court.
18
19

20 While TOSDAL styles his joinder (Docket Entry 6656) as being on behalf of "many"
21 when in fact is authorized by only his own 480 victims, CABRASER's thirteen Wildfire
22 Claimants join as well (Docket No. 6667), and ABRAMS joins on his own behalf (Docket No,
23 6659), the vast majority of claimants already are receiving such information directly from their
24 own counsel. *See* Exhibit A. The WATTS GUERRA GROUP (18,000), SINGLETON (7,000),
25 DANKO (6,000), and FRANTZ (5,000), represent hundreds of times more victims than those
26 filing joinders yesterday with this Court. While these joinders seek to amplify a supposed hue
27 and cry that does not significantly exist, the fact is those who have voted overwhelmingly
28

1 support this plan. (See Bloomberg article dated April 3, 2020, cited by SINGLETON) (Doc.
2 No. 6642).

3 While the WATTS GUERRA GROUP writes merely to respond to the joinders, this
4 Court does not need to grant a motion that may makes it seem that the TCC's imprimatur from
5 the concerns of six somehow means that the majority wildfire victims are against the plan; in
6 truth, just the reverse appears to be true.
7

8 Dated: April 7, 2020
9

10 Respectfully submitted,

11 **HANSEN & MILLER LAW FIRM**

12 /s/ Roy E. Miller

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